



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2

CITY VIEW PLAZA II BUILDING, 7TH FLOOR
ROUTE 165 GUAYNABO, PUERTO RICO 00968

APR 2 2019

Patricio Martínez-Lorenzo, Esq.
Comprehensive Environmental Legal Services, PSC
P.O. Box 13628
San Juan, Puerto Rico 00908

Subject: Freedom of Information Act Request EPA-R2-2017-004970

Dear Mr. Martinez,

This is in response to your March 2017 Freedom of Information Act (FOIA) request. As stated in your email dated October 3, 2018, the U.S. Environmental Protection Agency (EPA) limited the FOIA request as follows:

All FOIA request references to a time before June 2012, or May 2012, for example: "prior to June, 2012", "prior to May 21, 2012", shall be understood retroactive four (4) years to the same month in 2008. The reference to a time "before March 2013" shall be understood retroactive five (5) years, to the same month in 2008.

Enclosed you will find copies of documents related to training requirements per EPA Order 3500.1 for Carlos Rivera, Angel Rodriguez, and Francisco Claudio. Jose Soto served as acting chief for the Multimedia Permits and Compliance Branch from April 2012 through August 2012 under a Full-Time Detail/Temporary Promotion Not to Exceed 120 Days. Please note that EPA Order 3500.1 requires that all first-line supervisors or team leaders of compliance inspectors/field investigators and of compliance sampling specialists are responsible for completing training requirements within one year of assuming a first-line supervisor or team leader position. The position that Mr. Soto was holding in 2012 was planned for a period not to exceed 120 days, therefore Mr. Soto was not required at the time to meet the supervisor training requirements per EPA Order 3500.1. The same applies to Ramon Torres who was serving as Angel Rodriguez's first line Supervisor in June 2012 under a Full-Time Detail/Temporary Promotion as chief of the Response and Remediation Branch. Therefore, this letter does not include documents for Jose Soto and Ramon Torres in their capacity of serving as acting supervisor.

EPA Order 3500.1 establishes minimum and consistent Agency-wide training and development programs for employees conducting, participating in, or assisting with environmental compliance inspections/field investigations. Attachment 1 includes copies of the Pre-October 2014 EPA Order 3500.1 Inspector Training Requirements Completion Certification Form for Federal EPA Employees (Inspector's Certification Form) for the Enforcement Officers (EOs) above mentioned. These Inspector's Certification Forms list compliance with training requirements per EPA Order 3500.1 under the CAA-Stationary Sources or CERCLA programs. Attachment 2 includes available information of an internal review performed prior to the issuance of the inspector credential for Francisco Claudio and Carlos Rivera in 2010 and 2011 respectively.

If you have any questions regarding this submittal, please feel free to contact Nancy Rodriguez, Chief of the Multimedia Permits and Compliance Branch at (787) 977-5887, or via e-mail: Rodriguez.nancy@epa.gov.

Sincerely,



Carmen R Guerrero-Pérez

Director

Caribbean Environmental Protection Division

Attachments